

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

AUDIOVOX COMMUNICATIONS CORP.,

Plaintiff,

v.

PANTECH CO., LTD.,

Defendant.

Case No. 1:10-cv-04982(AKH)

NOTICE OF MOTION FOR DEFAULT  
JUDGMENT ON COUNTERCLAIM OF  
PANTECH, CO., LTD.

ECF CASE

**DEFENDANT PANTECH CO., LTD.'S NOTICE OF MOTION FOR  
DEFAULT JUDGMENT ON COUNTERCLAIM**

PLEASE TAKE NOTICE that Defendant Pantech Co., Ltd. ("Pantech"), by undersigned counsel and pursuant to Federal Rule of Civil Procedure 55(b)(2), hereby moves this Court to enter a Default Judgment against Plaintiff Audiovox Communications Corporation ("Plaintiff") on Pantech's Counterclaim as presented in its First Amended Answer, Affirmative Defenses, and Counterclaim, which was filed on January 4, 2012, in response to Plaintiff's Amended Complaint For Patent Infringement ("Complaint"). Attached, per Local Civil Rule 55.2(b) and the SDNY Electronic Case Filing Rules & Instructions R. 16.2, are the following exhibits:

1. the signed Clerk's certificate of default issued January 24, 2012,
2. a copy of Pantech's First Amended Answer, Affirmative Defenses, and Counterclaim, and the CM/ECF filing receipt, and
3. a proposed form of the default judgment.

Also filed herewith are the Affidavit in Support of Pantech's Request for Certificate of Default, executed by Wayne M. Helge and dated January 24, 2012, and Pantech's Memorandum of Law in Support of Pantech's Motion for Default Judgment.

Dated this 24<sup>th</sup> day of January 2012.

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Attorneys for Pantech Co., Ltd.

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of **DEFENDANT PANTECH CO., LTD.’S NOTICE OF MOTION FOR DEFAULT JUDGMENT ON ITS COUNTERCLAIM AGAINST PLAINTIFF**, its **AFFIDAVIT OF WAYNE M. HELGE IN SUPPORT OF DEFENDANT PANTECH CO., LTD.’S REQUEST FOR CERTIFICATE OF DEFAULT ON COUNTERCLAIM**, and its **MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT ON ITS COUNTERCLAIM** were filed electronically and served on January 24, 2012 via the Court’s CM/ECF system, through which all counsel of record who are deemed to have consented to electronic service are being served. Copies thereof are also being sent via Federal Express to Plaintiff’s counsel of record.

/s/ Wayne M. Helge  
H.C. PARK & ASSOCIATES, PLC

Attorneys for Pantech Co., Ltd.